

EXHIBIT 2

Sworn Affidavit of Dr. Charles Gray, Montana State University, Bozeman, Montana, MT

Explanatory notes about the context, added by Jay Hegdé:

- As noted in my Grievance Statement of October 28, 2015, Dr. Gray was an eyewitness to the death of the monkey named “Ovechkin” on January 7, 2014.
- He was not interviewed by AU officials until October 2015. Even when he was finally interviewed, by Ms. Angelica Hardison (one of the Witnesses called by the Grievant), she failed to ask him many of the crucial questions, as indicated by her own notes.
- This sworn affidavit officially documents Dr. Gray account for the first time.
- His account fully corroborates the corresponding portions of my account in that, among other things:
 - (i) He also believes the animal died due to a “reaction to” the analgesic (i.e., painkiller).
 - (ii) The surgery itself went smoothly, was uneventful, and was normal in duration (contrary to the innuendos of the AU officials who were not present).
- This cover page -- and only the cover page -- of this exhibit is prepared by the me. The remainder of this exhibit were provided by the Affiant, Dr. Gray.

AFFIDAVIT OF DOCTOR CHARLES GRAY

Comes now CHARLES GRAY, who, after being duly sworn, did depose as follows:

1.

My name is Dr. Charles Gray. I am over eighteen years of age and I have read this affidavit completely, and, based on my own personal knowledge do testify as set forth below. I do so of my own free will and without any hindrance of making this statement.

2.

I am a Professor in the Department of Cell Biology and Neuroscience at Montana State University in Bozeman, Montana. I was visiting Dr. Jay Hegde at the Brain and Behavior Discovery Institute at the Georgia Regents University (hereinafter "GRU") in Augusta, Georgia in January 2014 when a rhesus macaque monkey that we worked with died. The animal's name was Ovechkin. I was present during the craniotomy surgical procedure, which was performed on this animal by Doctor Hegde on January 7, 2014. I was a surgeon during this procedure. This is a procedure I have performed many times, over many years, and I am very competent in performing the procedure and in assessing the patients during the procedure.

3.

There were four members to the surgical team, myself, Dr. Jay Hegde, an anesthesia veterinary tech, and a veterinarian. The veterinary technician was named Cedrick Bouey. I cannot recall the name of the veterinarian.

4.

As a surgeon, there is protocol that was followed by the team and followed by myself as a surgeon. The surgery went well with no events up to the end of the surgery.

5.

After the completion of the surgery, all indications about the health of the animal were normal and uneventful, I felt comfortable turning the care of the animal over to the tech and veterinarian so I broke sterility and went out of the operating theater into an adjacent observation room. After about 10 to 15 minutes I noticed that the tech and veterinarian were spending a lot of time with Ovechkin. I became concerned and went back into the operating room. At that time I noted that the animal had been extubated and taken off the stereotactic device. I was told by the veterinarian that the pulse was very weak and the animal was not breathing. The tech and veterinarian were in the process of attempting to resuscitate the animal. They administered

adrenalin and another drug to stimulate the heart. During the attempts to revive the animal I never saw the animal move on its own.

6.

I noticed that the animal was extubated and suggested that they intubate him to improve ventilation efforts. When they did not respond to this suggestion, I intubated the animal. The animal was never revived.

7.

Based on my past experience, I believe it possible that the animal might have received too much analgesic following the surgery. No information was made available to me by the technician or the veterinarian regarding the dose of the post-operative analgesic given to the animal. I am certain that the animal appeared in good health at the completion of the surgery.

8.

I cannot logically see why the animal would have been extubated had the animal failed to exhibit clear signs that it had recovered sufficiently from anesthesia. When I re-entered the operating room and assessed the situation, I intubated the animal while the technician and veterinarian were continuing to make attempts at reviving the animal with the administration of one or more drugs. I was surprised that their attempts did not include re-intubating the animal. In my opinion the animal should not have been extubated following the surgery unless there were clear signs that it was able to breathe on its own.

9.

I have performed an identical or nearly identical surgical procedure many times at my own institution, Montana State University. I have also performed the same or closely related surgical procedure at numerous other institutions in the United States (*e.g.*, University of Rochester, University of Chicago, Northwestern University, UCLA, UC Berkeley, New York University, Carnegie Mellon University), Germany (Max-Planck-Institute for Brain Research) and Singapore (National University of Singapore). The procedure I assisted Dr. Hegde with at GRU was similar in every respect to all of these procedures. The surgical procedure I assisted Dr. Hegde with was normal in length. There were no complications during the surgery at GRU and I had every reason to believe that the animal was healthy throughout the surgical procedure and that it would make a full recovery.

10.

Several months after the monkey's death, I had a phone interview with someone at

Georgia Regents University but I have never been shown any written record or provided any recorded version of that interview.

11.

This is the best of my recollection and I make these statements on February 22, 2016, and am aware that I am testifying under oath.

Affiant further sayeth not.



CHARLES GRAY

Sworn Before Me this 22 day of February, 2016



Notary Public, Gallatin County, Montana

